

EXHIBIT A

MARVIN R. WALDEN, JR. (ID#:009671981)
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Attorney for plaintiff

FRANCES M. SHELTON,

Plaintiff,

vs.

TRANS-BRIDGE LINES, INC., MARIO
REZUSA, JOHN DOE 1-5, JOHN DOE A-Z
(FICTITIOUS NAMES),

Defendant

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – HUDSON COUNTY

Civil Action

Docket #:

COMPLAINT AND JURY DEMAND

Plaintiff, **FRANCES M. SHELTON**, residing at 910 Rahway Avenue, Westfield, New Jersey, complaining of the defendants, state:

FIRST COUNT

1. That on or about July 18, 2019 plaintiff, **FRANCES M. SHELTON**, was a lawful passenger traveling in or about the Lincoln Tunnel Port Authority area, next to or near Weehawken, New Jersey, in a bus owned by **TRANS-BRIDGE LINES, INC.** a commercial bus company transporting persons to and from the Port Authority in New York City through the State of New Jersey.
2. That upon information and belief, defendant **MARIO REZUSA** was the driver and acting as agent, servant and/or employee, driving said bus with the permission and consent of defendant **TRANS-BRIDGE LINES, INC.**

3. That defendant **JOHN DOE 1-5** is a fictitious name for the actual driver, servant and/or employee, whose full name is presently unknown driving the bus.
4. That at the time and place aforesaid, the defendants, **MARIO REZUSA, JOHN DOE 1-5** as agents, servants and/or employees were operating a bus in a careless, reckless, and negligent manner swerving violently causing plaintiff to be thrown from her seat landing on the floor.
5. As a result of the negligence of the defendants, **TRANS-BRIDGE LINES, INC., MARIO REZUSA, JOHN DOE 1-5** Plaintiff, **FRANCES M. SHELTON**, was caused to sustain severe and permanent injuries; has suffered, continues to suffer, and will in the future suffer great pain and mental anguish; has incurred, continues to incur, and will in the future incur large medical expenses in an effort to cure herself of her said injuries; has been prevented, continues to be prevented, and will in the future be prevented from engaging in her usual activities; and was otherwise damaged.
6. At the time and place aforesaid, defendant **MARIO REZUSA, JOHN DOE 1-5** operated their vehicle:
 - a) Without having the vehicle under control; and
 - b) Without having said vehicle equipped with proper brakes; and
 - c) Without being able to stop said vehicle within the assured clear distance of other vehicles on the highway.

WHEREFORE, plaintiff, **FRANCES M. SHELTON** demands judgment against the defendant for damages, interest and costs of suit.

SECOND COUNT

1. Plaintiff repeats each and every allegation set forth heretofore as though fully set forth herein.
2. "JOHN DOE A-Z" is a fictitious name, the party or parties intended being one or more persons whose identities are presently unknown but will be ascertained during the course of pre-trial discovery.
3. The conduct, actions or admissions of defendant "JOHN DOE A-Z," to be determined during the course of pre-trial discovery, were substantial factors in causing the injuries sustained by plaintiff as more described hereinabove.

WHEREFORE, plaintiff demands judgment against the defendants jointly, severally or in the alternative, for damages together with interest and costs of suit

GREENBERG & WALDEN
Attorneys for Plaintiff

MARVIN R. WALDEN, JR.

Dated: May 19, 2021

DESIGNATION OF TRIAL COUNSEL

Plaintiff hereby designates Marvin R. Walden, Esq. as trial counsel.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all causes of action set forth herein.

CERTIFICATION

I certify pursuant to Rule 4:5-1 that to the best of my knowledge, information and belief, the matter in controversy is not the subject matter of any other action pending in any other Court nor of any pending arbitration proceeding, and no other action or arbitration proceeding, and no other action or arbitration is contemplated. Further, there are no other parties who should be joined in this action.

GREENBERG & WALDEN
Attorneys for Plaintiff

MARVIN R. WALDEN, JR.

Dated: May 19, 2021

CERTIFICATION

1. I, Joseph F. Altongy, MD am a medical doctor licensed to practice medicine in the State of New Jersey.
2. Frances Shelton under my care as a result of injuries she sustained in a motor vehicle accident, which occurred on July 18, 2019.
3. The injuries which I diagnosed for her as a result of that accident were: Post-traumatic sprain and strain of the cervical spine with post-traumatic cervical spine facet joint syndrome with MRI evidence of disc herniations at C2-C3, C3-C4, C4-C5 and C6-C7 and disc bulging at C5-C6 with cervical and trapezial myofascitis; post-traumatic sprain and strain of the right shoulder with post-traumatic impingement syndrome with acromioclavicular joint arthrosis with MRI evidence of partial tear of the supraspinatus tendon with right shoulder synovitis; post-traumatic sprain and strain of the lumbar spine with post-traumatic lumbar spine facet joint syndrome with MRI evidence of disc herniation at L3-L4 and disc bulging at L1-L2, L2-L3 and L4-L5 with EMG evidence of bilateral L3-L4 radiculopathy, with lumbosacral myofascitis; post-traumatic sprain and strain of the right knee with post-traumatic patellofemoral chondromalacia with MRI evidence of torn medial meniscus and grade I sprain of the medial collateral ligament with right knee synovitis; post-traumatic sprain and strain of the left knee with post-traumatic patellofemoral chondromalacia with MRI evidence of torn medial and lateral menisci and grade I sprain of the medial collateral ligament with left knee synovitis.
4. Those diagnoses were made as a result of my physical examination and observation of Frances Shelton and the following diagnostic tests:

X-rays of the cervical spine and right shoulder performed July 30, 2019
MRIs of the cervical spine, lumbar spine and left knee performed September 24, 2019
MRIs of the right shoulder and right knee performed December 31, 2019
EMGs of the upper and lower extremities performed October 23, 2019
5. As a result of that accident, Frances Shelton has sustained a permanent injury to the cervical spine, right shoulder, lumbar spine and both knees within a reasonable degree of medical probability; i.e. Ms. Shelton's cervical spine, right shoulder, lumbar spine and both knee have not healed to function normally and will not heal to function normally with further medical treatment.

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RE: Frances Shelton

6. I hereby certify that the foregoing statements made by me are true.
I am aware that if any of the foregoing statements made are
willfully false, I am subject to punishment.

Dated: December 28, 2020

Joseph F. Altongy

Joseph F. Altongy, M.D.